

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
CASE NO.: 1:19-CV-09156 (LTS) (KHP)

- - - - - x

GRAHAM CHASE ROBINSON,

Plaintiff,

- against -

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

- - - - - x

ZOOM VIDEOCONFERENCE DEPOSITION OF
ROBERT DE NIRO
April 4, 2022

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1 say what it is.

2 But I saw that she wanted to control
3 everything. And what -- that's a problem when
4 people want to control everything. They don't
5 realize that you just have to use the best of
6 what the people have. Respect them and you will
7 get a lot further.

8 She had ideas about wanting to be an
9 executive and this and that, wanting me to give
10 her all kinds of titles. I said the only thing
11 you need from me -- you don't need those titles.
12 They mean nothing. All you need is a letter of
13 recommendation from me, and that's it.

14 And I didn't even say do your job.
15 What I was thinking is just do your job. Do the
16 right thing. Be honest. Be straightforward.
17 You'll always come out ahead.

18 That's all I ask. It is the honor
19 system. You do the right thing, you get repaid
20 accordingly. It is that simple.

21 BY MR. SANFORD:

22 Q. Do you remember my question?

23 A. You can repeat it if you want.

24 Q. Do you remember it?

25 MR. DROGIN: Note the objection

1 things so I don't have to go to each person and
2 say you do this, you do that.

3 That is what that was. She had a
4 lot of control.

5 Q. So she controlled delegating
6 assignments and she was that point person
7 throughout the time she had worked for you?

8 A. Yes, pretty much, yes.

9 Q. All right.

10 During her employment -- during
11 Ms. Robinson's employment at Canal, how many
12 times would you communicate with her during an
13 average day?

14 MR. DROGIN: Objection to form.

15 A. A few times.

16 THE WITNESS: Sorry.

17 MR. DROGIN: Objection to the
18 form.

19 You can answer.

20 BY MR. SANFORD:

21 Q. You can answer.

22 A. I would be talking to her a lot
23 during the day. How is this? How is that? She
24 would call me, e-mail. This is being done, dah,
25 dah, dah. You know, it was just the usual

1 stuff.

2 Q. How frequently would you text
3 Ms. Robinson during an average day?

4 A. I don't remember. You know, I don't
5 remember.

6 Q. How often would you meet with
7 Ms. Robinson in a typical day?

8 A. It could be once a day. Sometimes
9 not for a day or two or three if I'm busy doing
10 something other than just being out of town.

11 Q. During Ms. Robinson's employment at
12 Canal, Ms. Robinson generally kept you apprised
13 of where she was throughout the course of a day,
14 didn't she?

15 MR. BENNETT: Objection.

16 A. I think she probably did, but I'm
17 not a hundred percent sure. Sometimes she
18 didn't. But I would just rely on her. I would
19 call her or say call me and that would be that.

20 BY MR. SANFORD:

21 Q. It was common for you and
22 Ms. Robinson to speak early in the morning
23 before 9:00 a.m., right?

24 A. I think yes --

25 MR. BENNETT: Objection.

1 A. I think in the beginning of the day,
2 yes.

3 BY MR. SANFORD:

4 Q. And it was common for Ms. Robinson
5 to do work for you early in the morning as well,
6 right?

7 MR. BENNETT: Objection.

8 A. At times.

9 BY MR. SANFORD:

10 Q. And it was common for you and
11 Ms. Robinson to speak late at night until 8:00
12 o'clock or later, right?

13 MR. BENNETT: Objection.

14 A. It could be.

15 THE WITNESS: I'm sorry, should I
16 not answer? Or are you saying
17 objection?

18 MR. BENNETT: It's okay, Bob, go
19 ahead. I'll be very clear if I don't
20 want you to answer.

21 BY MR. SANFORD:

22 Q. And it was common for you and
23 Ms. Robinson or Ms. Robinson to speak with you
24 and do work on the weekends, right?

25 MR. BENNETT: Objection.

1 A. Yes, if need be, yes.

2 BY MR. SANFORD:

3 Q. And it was common for you and
4 Ms. Robinson to speak on holidays, right?

5 MR. BENNETT: Objection.

6 A. If need be, yes.

7 BY MR. SANFORD:

8 Q. And during Ms. Robinson's employment
9 at Canal, Ms. Robinson kept you apprised if she
10 was going to be away from New York, right?

11 MR. BENNETT: Objection.

12 A. Yes, she said she would like to go
13 to Spain or London and do this, and I -- you
14 know, with the internet and technology these
15 days, I said okay. Even phones, okay.
16 That's -- I want to accommodate her. I want to
17 make her happy. I just -- that's how I am.

18 If people want to do something, they
19 need to do it that way. I'll say okay. I'm
20 okay with that as long as you do what you need
21 to have done.

22 BY MR. SANFORD:

23 Q. Ms. Robinson checked with you before
24 traveling from New York, going outside of New
25 York, right?

1 Yes, she is a personal assistant. She also was
2 very important as far as helping me with those
3 things.

4 BY MR. SANFORD:

5 Q. So besides getting presents and
6 going to stores, what else would she do?

7 A. Well, you know, whatever,
8 whatever -- she helped me with the house. She
9 pulled in a friend of hers. I said fine, an
10 interior designer.

11 We would go to the design center or
12 here and there, look for furniture. Order
13 furniture to certain specifications. She helped
14 me with this, a piece of furniture. Be there
15 waiting when it would come in, or somebody --
16 she would have Michael there waiting for when it
17 would come in.

18 You know, it was anything. Anything
19 and everything.

20 Q. Okay.

21 Ms. Robinson's titles changed at
22 various times during her employment at Canal,
23 didn't they?

24 A. At her request.

25 MR. SANFORD: We are sharing a

1 saying how about -- she kept coming back with
2 different titles and that was head of finance.

3 So I said okay. I mean, I was so
4 tired of her asking for this and I thought to
5 myself, well, this is what people do and certain
6 people want. They want some raise in their
7 stature in the company. So the company will
8 give them a title. That way they don't have to
9 give them as much money.

10 In my case, I gave her money and the
11 title, but the title meant nothing. I said at
12 the end of the day, it is just what you do for
13 me, what you do, what you do for the company
14 is -- and do it honorably, there's nothing, you
15 know -- I would give you the highest
16 recommendation.

17 And if you had to go to another
18 company because you got a better offer, more
19 power to you. I would never stop anybody. I
20 would encourage people, especially if they're
21 younger.

22 They might -- the job -- what is
23 good for them is for a while, but they want to
24 move on. So, fine, I want to help you. I'm not
25 going to stop you.

1 you don't know whether you promised Ms. Robinson
2 that her work conditions would improve during
3 the meeting with her in early January 2019?

4 MR. DROGIN: Objection to the
5 form.

6 You can answer, Bob.

7 A. I can't -- I don't know what she's
8 talking about. If she said you promised me
9 this, you promised me that, you promised me
10 this, I'd say well, I did promise you that, but
11 not this and not that.

12 But I don't see any of that here. I
13 don't know what she is talking about.

14 BY MR. SANFORD:

15 Q. All right.

16 You were the final decision maker
17 when it came to employee salaries at Canal,
18 right?

19 A. Yes.

20 Q. Ms. Robinson could not set employee
21 salaries without your approval, right?

22 A. Yes.

23 MR. BENNETT: Objection.

24 BY MR. SANFORD:

25 Q. You were the final decision maker

1 when it came to employee bonuses at Canal,
2 right?

3 A. I was made aware and then I would
4 say okay.

5 Q. Ms. Robinson could not set employee
6 bonuses without your approval, correct?

7 A. Yes, I mean, she should -- I mean,
8 the only thing I think of is after a couple of
9 years is she knew this would be the norm. We do
10 the same as last year. That's the only thing.

11 But if anything was changing or
12 anything was up or this and that, she was
13 obligated to make me aware of that.

14 Q. You were the final decision maker
15 when it came to hiring employees at Canal,
16 correct?

17 A. Yes.

18 Q. Ms. Robinson could not make an offer
19 of employment without your approval, right?

20 A. Yes, but I don't know what -- you're
21 asking me a question that I'm waiting for some
22 kind of curve ball to come and say -- yes.

23 Q. There's no curve ball, Mr. De Niro.
24 I'm just asking a simple question and asking for
25 simple answers.

1 A. To you guys, I don't know. But
2 anyway.

3 Q. So the answer to my question --
4 Ms. Robinson could not make an offer of
5 employment without your approval, right?

6 A. That's probably, yes.

7 Q. All right.

8 You were the final decision maker --

9 A. Sorry, go ahead.

10 Q. I'm sorry?

11 A. At face value what it said, I could
12 say yes.

13 Q. Okay.

14 You were the final decision maker
15 when it came to terminating employees at Canal,
16 correct?

17 A. Yes, yes.

18 Q. Ms. Robinson could not terminate an
19 employee without your approval, right?

20 A. No.

21 Q. That is to say she could not
22 terminate?

23 A. No, she couldn't. The people in the
24 office, in my immediate office, that's all, the
25 only jurisdiction she would have. And she would

1 have to run that by me, yes.

2 Q. Okay.

3 You were the final decision maker
4 when it came to Canal's policies, correct?

5 A. Yes.

6 Q. And Ms. Robinson could not implement
7 an office policy of significance without your
8 approval, right?

9 MR. BENNETT: Objection.

10 A. She couldn't, but we don't know -- I
11 don't know what she did in my name and said that
12 I approved it. I wouldn't at this point put
13 things past her knowing what she has done.

14 So I have to think about that and
15 know exactly what she did or what was done that
16 I got my approval or not.

17 BY MR. SANFORD:

18 Q. I'm not asking what, in fact,
19 happened. I'm just saying as a matter of
20 policy, you needed to approve, you know --

21 A. As a matter of policy that is honest
22 and transparent and well-meaning and positive,
23 yes.

24 Q. Okay.

25 You were the final decision maker

1 form.

2 You can answer.

3 A. I don't remember.

4 BY MR. SANFORD:

5 Q. Is that right?

6 A. I don't remember that.

7 Q. Do you remember Martin Scorsese's
8 birthday party at your house?

9 A. No. I don't even remember. When
10 was that? How long ago was that?

11 Q. I'm asking you.

12 Do you remember it at all?

13 A. I don't remember.

14 Q. Do you remember having a birthday
15 party at your house for Martin Scorsese?

16 A. When, what year was this?

17 Q. Any year you can remember.

18 A. I can't remember it.

19 Q. Ms. Robinson would at times mend
20 your clothing, correct?

21 A. No, she wouldn't.

22 Q. Ms. Robinson would at times select
23 gifts for your children; wouldn't she?

24 A. That might be so, yes.

25 Q. Okay.

1 A. With me.

2 Q. It is not that it might be so, you
3 have already testified that it is so?

4 MR. BENNETT: Objection.

5 A. Well, then it is. Whatever. That's
6 fine.

7 BY MR. SANFORD:

8 Q. Ms. Robinson would at times make
9 your bed; wouldn't she?

10 A. No.

11 Q. Ms. Robinson would at times --

12 A. Is she trying to say that she used
13 to make my bed? This is nonsense.

14 Q. Ms. Robinson would at times
15 organize your closets; wouldn't she?

16 A. That, she did a little of, yes,
17 because she ordered the closet. California
18 Closets. And she did it wrong too, by the way.

19 Q. Okay.

20 Ms. Robinson would routinely
21 throughout her tenure at Canal oversee your
22 schedule; wouldn't she?

23 A. Yes.

24 Q. Ms. Robinson would remind you to
25 take and refill your medicine; wouldn't she?

1 A. She wouldn't remind me. I knew.
2 She would refill my medicine. She didn't do
3 that. See, right now these are questions like
4 she is a wife or something or my assistant. I
5 don't know what this is. What this implies.
6 But it is creepy.

7 Q. Ms. Robinson would routinely
8 communicate with your doctors; wouldn't she?

9 A. No.

10 MR. DROGIN: Objection to the
11 form.

12 BY MR. SANFORD:

13 Q. Ms. Robinson would arrange furniture
14 deliveries for you; wouldn't she?

15 A. That, yes, she would do.

16 Q. Ms. Robinson would routinely arrange
17 flower deliveries for you; wouldn't she?

18 A. That, she could do.

19 Q. Ms. Robinson would help organize and
20 decorate parties for you; wouldn't she?

21 A. That, she could do.

22 Q. Ms. Robinson would arrange your
23 travel via private jet; wouldn't she?

24 A. That, she could do.

25 Q. Ms. Robinson -- and when you say she

1 could do, she did do it, right?

2 A. She did.

3 Q. Ms. Robinson would routinely run
4 errands for the Canal office and for you and
5 your family; wouldn't she?

6 MR. BENNETT: Objection.

7 A. Yes.

8 BY MR. SANFORD:

9 Q. Ms. Robinson would RSVP to events on
10 your behalf; wouldn't she?

11 A. Yes.

12 Q. Ms. Robinson would at times field
13 media requests on your behalf; wouldn't she?

14 MR. BENNETT: Objection.

15 A. Yes.

16 BY MR. SANFORD:

17 Q. Ms. Robinson would generally remind
18 you to pick out gifts; wouldn't she?

19 A. She could. Her job was to remind
20 me. I say remind me, there's a list, I have to
21 get these particular gifts for certain people
22 for their birthday, for Christmas, whatever,
23 yes.

24 Q. Ms. Robinson often accompanied you
25 while you picked out gifts for family and close

1 familiar friends; wouldn't she?

2 MR. DROGIN: Objection to form.

3 A. Yes.

4 BY MR. SANFORD:

5 Q. Ms. Robinson would generally help
6 manage your contacts list; wouldn't she?

7 MR. BENNETT: Objection.

8 A. Yes.

9 BY MR. SANFORD:

10 Q. Ms. Robinson would coordinate your
11 award show votes; wouldn't she?

12 A. My award show what?

13 Q. Votes.

14 A. Well, help set it up for me and then
15 I would do my own voting. It wasn't like she
16 was part of.

17 Q. And by that, I mean the Oscar votes,
18 right?

19 MR. BENNETT: Objection.

20 A. Yes, but that's in the computer.

21 Not -- that's all she did.

22 BY MR. SANFORD:

23 Q. Ms. Robinson would often look up
24 restaurants for you; wouldn't she?

25 A. Yes.

1 Q. I'm sorry?

2 A. Yes, she did.

3 Q. Ms. Robinson would vet vacation
4 rentals for you; wouldn't she?

5 A. Yes, she did.

6 Q. Ms. Robinson vetted home rentals for
7 you; wouldn't she?

8 A. Yes, she did.

9 Q. Ms. Robinson researched potential
10 schools for your son; didn't she?

11 A. She might have done some, yes.

12 Q. Ms. Robinson assisted with your
13 pets; didn't she?

14 A. She might have.

15 Q. When you say might have, you're
16 saying "yes"?

17 A. I don't know because I have pets.
18 We had pets. Tiffany had pets. I don't know.
19 That was the overlap. So I don't know.

20 Q. Ms. Robinson scouted hotels all over
21 the world for you; didn't she?

22 A. Not all -- wherever I had to go on
23 location she did go. I trusted her to go do
24 that.

25 Q. Ms. Robinson researched options for

1 the purchase of your bed; didn't she?

2 A. The purchase of my bed? Yes. My
3 furniture. All my furniture, yes.

4 Q. Ms. Robinson helped buy furnishings
5 for your home; didn't she?

6 A. She did, yes.

7 Q. Ms. Robinson vetted housekeepers for
8 you; didn't she?

9 A. Yes.

10 Q. Ms. Robinson researched options for
11 planters and pots for your plants; didn't she?

12 A. Yes.

13 Q. Ms. Robinson assisted with the
14 delivery of your plants; didn't she?

15 A. Yes.

16 Q. Ms. Robinson went plant shopping
17 with you; didn't she?

18 A. Yes, yes.

19 Q. Ms. Robinson went antique shopping
20 with you?

21 A. Yes, she did.

22 THE VIDEOGRAPHER: The time is
23 12:41. We are going off the record for
24 technical reasons.

25 (Whereupon, at 12:41 o'clock

1 p.m., a recess was taken until 12:43
2 o'clock p.m.)

3 THE VIDEOGRAPHER: The time is
4 1243. We are back on record.

5 BY MR. SANFORD:

6 Q. Mr. De Niro, you understand you're
7 still under oath?

8 A. Yes.

9 Q. All right.

10 Ms. Robinson collected photo options
11 to be framed for your home; didn't she?

12 A. What was that again?

13 Q. Ms. Robinson collected photo options
14 to be framed for your home, correct?

15 A. Yes, uh-hum.

16 Q. Ms. Robinson researched options for
17 talents; didn't she?

18 A. Yes, I think so.

19 Q. Ms. Robinson bought vacuums for your
20 home; didn't she?

21 A. Yes.

22 Q. Ms. Robinson reminded you to speak
23 with your children; didn't she?

24 A. No, she didn't remind me to speak
25 with my children. She was trying to do some of

1 that and my children resented her doing that.
2 Trying to, you know.

3 Q. You had Ms. Robinson coordinate your
4 schedule so that you could spend time with your
5 children over spring break; didn't you?

6 A. Yes, she coordinated all of that
7 stuff, yes.

8 Q. You had Ms. Robinson assist with
9 various items related to your former partner
10 Toukie Smith, didn't you?

11 A. Say that again.

12 Q. You had Ms. Robinson assist with
13 various things related to your former partner?

14 A. There was a point that she did that
15 briefly and that was it.

16 Q. What point was that?

17 A. Somewhere a couple years ago where
18 she was -- I asked her and Robin to do
19 something, but it didn't go very long.

20 Q. What did you ask Ms. Robinson to do
21 with respect to --

22 A. To help her with certain things.
23 Just it didn't --

24 Q. And this was about 2018, 2019,
25 correct?

1 A. Yes, around there, yes.

2 Q. And do you remember what you asked
3 Ms. Robinson to do with respect to Toukie Smith?

4 A. To help her out with certain things.
5 There was a nurse involved in getting and so on
6 and make sure she was okay.

7 Q. And who is Toukie Smith?

8 A. She is the mother of my twins.

9 Q. And, specifically, what did you ask
10 Ms. Robinson to do?

11 A. I don't remember specifically other
12 than to help out with Toukie and what she needed
13 with whatever it was at that time. I'm
14 forgetting.

15 Q. You asked Ms. Robinson to assist
16 with your divorce; didn't you?

17 A. In what way?

18 Q. Any way that you can remember.

19 A. No, she didn't assist in my divorce
20 other than helping me find a place. You know,
21 that was the townhouse.

22 Q. Do you remember if Ms. Robinson
23 pulled text messages and e-mails from Grace
24 Hightower?

25 A. She pulled what she could have, yes.

1 Q. And that assisted you in your
2 divorce; didn't it?

3 A. I guess if it was related to that,
4 yes.

5 Q. And she reviewed Black Amex card
6 statements regarding charges concerning your
7 kids; didn't she?

8 A. I don't remember. She could have.

9 Q. She basically collected evidence for
10 you to use in your divorce proceedings, isn't
11 that right?

12 A. She could have.

13 Q. When you say she could have, do you
14 mean "yes"?

15 A. I'm saying she could have. I don't
16 remember a hundred percent.

17 Q. Well, you would have no reason to
18 say that Ms. Robinson is lying under oath if she
19 testified to that?

20 A. Well, I think some things she's
21 not -- she's delusional. So what can I say?
22 There were things that she did pull. I just,
23 I'm worried because when I say one thing and
24 then it is made into a positive there's a
25 condition somewhere in the middle there. So I

1 say she could have. So that's it.

2 Q. Well, you don't dispute that Ms.
3 Robinson collected evidence to help you in your
4 divorce, right?

5 A. Yes, I think she did. I'll say that
6 like that.

7 Q. All right.

8 You asked Ms. Robinson to
9 communicate with your divorce attorney; didn't
10 you?

11 A. I might have.

12 Q. Is that a "yes"?

13 A. That's all I can say, is I might
14 have. You have the e-mails, so you have them.
15 So you know.

16 Q. On two occasions you asked Ms.
17 Robinson to accompany you to the emergency room,
18 didn't you?

19 A. Yes.

20 Q. Ms. Robinson on several occasions
21 accompanied you to doctors; didn't she?

22 A. Yes. I went to the emergency room
23 and maybe another doctor. I can't remember
24 specifically, yes.

25 Q. So a significant part of Ms.

1 Robinson's work for you at Canal involved
2 assisting you with your personal life; fair to
3 say?

4 A. Yes.

5 MR. DROGIN: Objection to the
6 form.

7 You can answer.

8 BY MR. SANFORD:

9 Q. What's the answer, sir?

10 A. Yes.

11 Q. Okay.

12 Ms. Robinson would create a list and
13 research your supplements for you; didn't she?

14 A. I don't know if she did that. I had
15 some supplements. She wouldn't research them.
16 She would get what I asked her to get me.

17 Q. Ms. Robinson would help you
18 understand the instructions before your
19 [REDACTED]; didn't she?

20 A. No, no, no. She might have -- no.

21 Q. She might have what?

22 A. Nothing. I know what the
23 instructions are. She might have read them once
24 and now all the sudden she's helping me with
25 instructions for my [REDACTED]. No, I did that

1 many times. I knew how to do it. I knew what
2 the procedure was.

3 Q. Ms. Robinson filled out medical
4 forms for you; didn't she?

5 A. She might have.

6 Q. Ms. Robinson was listed as your
7 emergency contact on medical forms; wasn't she?

8 A. Might have been if I thought she was
9 the fastest person to get because then she would
10 know who to get.

11 Q. When you say might have been, you're
12 saying "yes"?

13 A. Yes, that I'm saying "yes".

14 Q. Ms. Robinson would tour some of the
15 potential apartment rentals with you in person;
16 wouldn't she?

17 A. Yes.

18 Q. Ms. Robinson would tour some of the
19 potential apartment rentals with you on
20 FaceTime; wouldn't she?

21 A. Yes.

22 Q. Ms. Robinson would put the utility
23 accounts for the townhouse under her name if she
24 was unable to list them under a company name;
25 isn't that right?

1 A. She might have, yes.

2 Q. Ms. Robinson used her cell phone
3 number as the emergency contact for your ADT
4 system at your townhouse; didn't she?

5 A. She might have. And there was
6 something about she did that instead of giving
7 it to us or giving it to Tiffany. She was,
8 again, possessive my understanding was about
9 that.

10 Q. Ms. Robinson, in fact, gave you the
11 information regarding the ADT system; didn't she
12 or do you not remember?

13 A. I'm not sure. She might have given
14 it to me or Tiffany.

15 Q. You told Ms. Robinson that working
16 on the design and townhouse project was a good
17 skill for Ms. Robinson to have; didn't you?

18 A. I don't know if I said that. And if
19 I did so what? What does that mean?

20 Q. You asked Ms. Robinson to buy
21 interior design magazines and go over ideas with
22 you for the townhouse; didn't you?

23 A. I could have, yes.

24 Q. You asked Ms. Robinson to organize
25 your suits and shirts for you; didn't you?

1 A. I don't know if I did that. She did
2 the closet. So when I had stuff, I asked her to
3 put it in the closet.

4 Q. Well, she helped you unpack when you
5 moved in to [REDACTED], right?

6 A. That's what she does. That's what
7 she was supposed to do, yes. I mean, help me or
8 get somebody else to do it or she would, you
9 know, do it.

10 Q. You asked Ms. Robinson to go --

11 A. I don't, you know this is all crazy,
12 yes, okay.

13 Q. You asked Ms. Robinson to go to the
14 Decoration and Design and New York Design
15 Center, otherwise known as the D&D Building?

16 A. Yes.

17 Q. Sorry, Mr. De Niro, I need to finish
18 --

19 A. Rachel. The person she found, her
20 friend.

21 Q. I just have to finish my question so
22 we have a record.

23 A. Okay.

24 Q. You asked Ms. Robinson to go to the
25 Decoration and Design and New York Design Center

1 otherwise known as the D&D Building with you;
2 didn't you?

3 A. Yes.

4 Q. You looked at furnishings with Ms.
5 Robinson at those buildings, right?

6 A. Yes.

7 Q. And you looked at furnishings at
8 other outlets like Restoration Hardware, right?

9 A. Yes.

10 Q. And Ms. Robinson helped plan and
11 design room layouts in your townhouse, correct?

12 A. She helped with that, yes, to some
13 degree.

14 Q. And she helped pick out paint colors
15 for your townhouse; didn't she?

16 A. Yes.

17 Q. And Ms. Robinson helped you picked
18 out fabric options for your townhouse; didn't
19 she?

20 A. Yes.

21 Q. Ms. Robinson picked out a Christmas
22 tree for your townhouse in 2018; didn't she?

23 A. She did.

24 Q. Ms. Robinson went to art stores and
25 picked out art from your father for your

1 townhouse in 2018 and 2019; didn't she?

2 A. She could have, yes.

3 Q. Ms. Robinson helped coordinate in
4 2018 childproofing for your townhouse windows,
5 didn't she?

6 A. Yes.

7 Q. Ms. Robinson would display purchases
8 for the townhouse like blankets and lamps for
9 you to confirm what you liked or did not like,
10 correct?

11 A. Yes.

12 Q. Ms. Robinson designed and put an
13 anniversary photo album together as a gift for
14 your former wife Grace De Niro, correct?

15 A. Uh-hum. Yes.

16 Q. And she put together -- Ms. Robinson
17 put together photo albums for your children's
18 big birthdays, right?

19 A. Yes.

20 Q. Ms. Robinson met you at Blue Tree to
21 shop for gifts?

22 A. Yes.

23 Q. Ms. Robinson met you at the MoMA
24 store to shop for holiday gifts?

25 A. She had a couple times, yes.

1 Q. Ms. Robinson met you at the Neue
2 Galerie to shop for gifts?

3 A. Yes.

4 Q. Ms. Robinson made a photo card for
5 your former wife for Valentine's Day?

6 A. She, she was very good at making
7 those cards.

8 Q. Is that a "yes"?

9 A. That's a "yes".

10 Q. You had Ms. Robinson help your
11 former wife with decorating and planning Lucy
12 Damon's baby shower?

13 A. I don't know. She might have. I
14 don't, I don't know.

15 Q. You had Ms. Robinson help your
16 former wife schedule appointments for your
17 daughter's Helen's school search?

18 A. Could be. Yes.

19 Q. You had Ms. Robinson speak to your
20 former wife about the research she did for your
21 son Elliot's school search?

22 A. Say that again.

23 Q. You had Ms. Robinson speak to your
24 former wife about the research Ms. Robinson did
25 for your son Elliot's school search?

1 A. I'm sorry, just repeat that one more
2 time. I don't know why.

3 Q. Sure.

4 You had Ms. Robinson speak to your
5 former wife about the research she did relating
6 to Elliot's school search?

7 A. Okay. I could have, yes.

8 Q. And you had Ms. Robinson assist your
9 former wife with whatever your former wife
10 needed, correct?

11 MR. DROGIN: Objection to the
12 form.

13 You can answer it.

14 BY MR. SANFORD:

15 Q. Is that a "yes"?

16 A. What's the question again, sorry?

17 Q. You had Ms. Robinson assist your
18 former wife with whatever she needed?

19 MR. DROGIN: Objection to the
20 form.

21 A. Yes, that's too general.

22 BY MR. SANFORD:

23 Q. You had Ms. Robinson speak to your
24 current girlfriend Tiffany Chen and coordinate
25 what time she could come to your townhouse ■■■

1 [REDACTED] ?

2 A. No, no.

3 Q. That never happened?

4 A. No, I don't know what the point of
5 that question is either.

6 Q. You asked Ms. Robinson to find
7 Tiffany Chen medical insurance; didn't you?

8 A. I could have.

9 Q. You had Ms. Robinson assist Tiffany
10 Chen what with whatever Ms. Chen needed; didn't
11 you?

12 MR. DROGIN: Objection to the
13 form.

14 A. I could have.

15 BY MR. SANFORD:

16 Q. I'm sorry, the answer is?

17 A. Probably I could have, yes.

18 Q. You asked Ms. Robinson to review
19 your son Julian's [REDACTED] when he was
20 about 16 years old; didn't you?

21 A. I don't know if I would have asked
22 her to review his [REDACTED].

23 Q. You might have, you just don't
24 remember?

25 A. Huh?

EXHIBIT 2